REMARKS

In view of the following discussion, the Applicants submit that none of the claims now pending in the application are anticipated or obvious under the provisions of 35 U.S.C. § 102 and § 103. Thus, the Applicants believe that all of these claims are now in allowable form.

I. IN THE CLAIMS

The Applicants have amended various claims to correct typographical errors. The Applicants respectfully submit that these amendments were not made in response to the cited references and that no new matter was added.

II. CLAIM OBJECTIONS

A.   Claims 21, 31 and 60

The Examiner objected to claims 21, 31, and 60 as being of improper dependent form for failing to further limit the subject matter of a previous claim. The Applicants respectfully disagree. Claim 21 further teaches the method in which the input string is selected, i.e. comparing. Moreover, claims 31 and 60 further teach how the input string is generated, i.e. by an input device.   As such, the Applicants request the objection be withdrawn.

B.   Claims 23 and 51

The Examiner objected to claims 23 and 51 because of informalities. Namely, "voice recognizer" is used to describe receiving an input string. In response, the Applicants have amended claims 23 and 51 to change "voice recognizer" to "speech recognizer." As such, the Applicants respectfully request the objection be withdrawn.

III. REJECTION OF CLAIMS 1-21, 23-29, 31, 33-58 AND 60 UNDER 35 U.S.C. § 102

The Examiner rejected claims 1-21, 23-29, 31, 33-58 and 60 as being anticipated by Gorin et al. (US Patent 5,675,707, Issued October 7, 1997, hereinafter referred to as "Gorin".) The rejection is respectfully traversed.

Gorin teaches an automated call router system and method. A caller accessing the system is greeted. (See Gorin, Col. 3, Lines 30-40.) A caller responds to the greeting with a natural speech statement of the caller's objective. (See *Id.*) The system then either classifies the caller's request into one of a number of predefined objective routings and implements that routing or transfers the call to an operator. (See *Id.*) The call is classified into one of a number of predefined objective routings by comparing the speech to a database of utterances, each of which is related to one of a predetermined set of routing objectives. (See Gorin, Col. 4, Lines 27-35.)

The Examiner's attention is directed to the fact that Gorin fails to teach or to suggest a method for providing speech enable application program comprising: selecting from one or more natural language variants a prospective variant that most resembles the input string and identifying a natural language exemplar via a mapping between the exemplar and the prospective variant, as positively claimed by the Applicants' independent claims. Specifically, Applicants' independent claim 1 recites:

> 1. A method for providing speech-enabled application programs comprising:
>   responsive to an input string, selecting from one or more natural language variants a prospective variant that most resembles the input string; and
>   identifying a natural language exemplar via a mapping between the exemplar and the prospective variant. (Emphasis Added.)

Applicants' method comprises making two translations. First, the input string is translated by selecting a prospective variant that most resembles the input string. Second, the prospective variant is mapped to a natural language exemplar. The Examiner's attention is directed to the fact that an exemplar is not a "routing objective". The exemplar is defined in the Applicants' specification as exemplary English sentence defined by an applications developer that corresponds to phrasing of a particular request. (See Applicants' Specificaiton, Page 10, Lines 2-9.) This exemplar is then mapped to an action "A" that directs the application program as to what to execute. (See Applicants' Specification, Page 12, Lines 4-9.)

In contrast, Gorin teaches an automated call router system and method that uses only one translation. (See Gorin, Col. 4, Lines 27-36.) In Gorin, a speech input is compared to a number of stored utterances to extract the correct utterance (i.e. one

Page 12

translation.) (See *Id.*) Once the correct utterance is extracted the corresponding objective is executed to route the caller. (See *Id.*) Thus, Gorin <u>clearly</u> fails to anticipate Applicants' independent claims 1, 23, 33, 45 and 50.

Furthermore, dependent claims 2-21, 24-29, 31, 34-44, 46-49, 51-58 and 60 depend from independent claims 1, 23, 33, 45 and 50, respectively and recite additional limitations. For the same reasons discussed above, these dependent claims are also not anticipated by Gorin and are allowable. As such, the Applicants respectfully request the rejection be withdrawn.

IV. REJECTION OF CLAIMS 12, 13, 22, 30, 32, 43, 44, 59 AND 61 UNDER 35 U.S.C. § 103

The Examiner rejected claims 12, 13, 22, 30, 32, 43, 44, 59 and 61 as being unpatentable over Gorin in view of Vanbuskirk et al. (US Patent 6, 327, 566, Issued December 4, 2001, hereinafter referred to as "Vanbuskirk".) The rejection is respectfully traversed.

The teachings of Gorin have been discussed above. Vanbuskirk teaches a method and apparatus for correcting misinterpreted voice commands in a speech recognition system. The method parses spoken commands from a user into a paraphrased command; displays the paraphrased command; and accepts the corrections of the paraphrased command from the user. (See Vanbuskirk, Abstract.)

The Examiner's attention is directed to the fact that Gorin fails to teach or to suggest a method for providing speech enable application program comprising: <u>selecting from one or more natural language variants a prospective variant that most resembles the input string and identifying a natural language exemplar via a mapping between the exemplar and the prospective variant</u>, as positively claimed by the Applicants' independent claims. (See Applicants' independent claim 1, *supra.*)

Applicants' method comprises making <u>two translations</u>. First, the input string is translated by selecting a prospective variant that most resembles the input string. Second, the prospective variant is mapped to a natural language exemplar. The Examiner's attention is directed to the fact that an exemplar is <u>not</u> a "routing objective". The exemplar is defined in the Applicants' specification as exemplary English sentence

Page 13

defined by an applications developer that corresponds to phrasing of a particular request. (See Applicants' Specification, Page 10, Lines 2-9.) This exemplar is then mapped to an action "A" that directs the application program as to what to execute. (See Applicants' Specification, Page 12, Lines 4-9.)

In contrast, Gorin simply does not teach or suggest a method for providing speech enable application program comprising: selecting from one or more natural language variants a prospective variant that most resembles the input string and identifying a natural language exemplar via a mapping between the exemplar and the prospective variant. However, the Examiner then alleges that Vanbuskirk bridges the significant gap left by Gorin. The Applicants respectfully disagree.

Vanbuskirk only teaches a method for correcting misinterpreted voice commands in a speech recognition system that parses spoken commands from a user into a paraphrased command; displays the paraphrased command; and accepts the corrections of the paraphrased command from the user. (See Vanbuskirk, Abstract.) Vanbuskirk fails to teach, show or suggest a method for providing speech enable application program comprising: selecting from one or more natural language variants a prospective variant that most resembles the input string and identifying a natural language exemplar via a mapping between the exemplar and the prospective variant as claimed by the Applicants' independent claims. Therefore, Vanbuskirk clearly does not bridge the substantial gap left by Gorin.

In arguendo, even if Gorin and Vanbuskirk were combined, the combination would still not teach or suggest Applicants' invention. The combination of Gorin and Vanbuskirk would only teaches a method and system for an automated call router system comprising one translation with the ability to correct misinterpreted voice commands. Therefore, the combination of Gorin and Vanbuskirk does not teach or suggest Applicants' invention as recited in Applicants' independent claims 1, 23, 33, and 50.

Furthermore, dependent claims 12, 13, 22, 30, 32, 43, 44, 59 and 61 depend, either directly or indirectly, from claims 1, 23, 33, and 50 and recite additional limitations. As such, and for the exact same reason set forth above, the Applicants submit that claims 12, 13, 22, 30, 32, 43, 44, 59 and 61 are also patentable and not

Page 14

made obvious by the teachings of Gorin and Vanbuskirk. As such, the Applicants respectfully request the rejection be withdrawn.

Conclusion

Thus, the Applicants submit that all of these claims now fully satisfy the requirement of 35 U.S.C. §102 and §103. Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

If, however, the Examiner believes that there are any unresolved issues requiring the issuance of a final action in any of the claims now pending in the application, it is requested that the Examiner telephone <u>Mr. Kin-Wah Tong, Esq.</u> at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

_8/4/05_

Moser, Patterson & Sheridan, LLP
595 Shrewsbury Avenue
Shrewsbury, New Jersey 07702

Kin-Wah Tong, Attorney
Reg. No. 39,400
(732) 530-9404

Page 15